

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

NOVO NORDISK A/S AND NOVO
NORDISK INC.,

Plaintiffs,

v.

PRO HEALTH INVESTMENTS, LLC,

Defendant.

Case No. 2:23-cv-02369-JPM-atc

**JOINT MOTION FOR ENTRY OF PROPOSED
CONSENT PRELIMINARY INJUNCTION ORDER
AND MEMORANDUM IN SUPPORT**

Plaintiffs Novo Nordisk A/S and Novo Nordisk Inc. (together, “Novo Nordisk”) and Defendant Pro Health Investments, LLC (“Pro Health”), by and through their undersigned counsel and in accordance with Local Rule 7.2, hereby jointly move the Court for entry of the proposed Consent Preliminary Injunction Order that counsel is contemporaneously emailing to the Court.

In support of this motion, Novo Nordisk and Pro Health respectfully show that, in accordance with Local Rule 7.2(a)(1)(B), counsel for the parties have met and conferred regarding Novo Nordisk’s intent to seek preliminary injunctive relief in this action, and Novo Nordisk and Pro Health have agreed to the terms of the Consent Preliminary Injunction Order. The proposed order provides for preliminary injunctive relief as described therein, which will remain in effect during the pendency of this action. FED.R.CIV.P. 65(a), 65(d).

WHEREFORE, Plaintiffs Novo Nordisk A/S and Novo Nordisk Inc. and Defendant Pro Health Investments, LLC jointly request that the Court enter the proposed Consent Preliminary

Injunction Order.

Respectfully submitted, this 27th day of July, 2023.

RILEY & JACOBSON, PLC

s/ Steven A. Riley

Steven A. Riley
(TN Bar No. 6258)
Milton S. McGee, III
(TN Bar No. 24150)

1906 West End Ave.
Nashville, TN 37203
(615) 320-3700
sriley@rjfirm.com
tmcghee@rjfirm.com

Joseph N. Akrotirianakis
Aaron S. Craig
KING & SPALDING LLP
633 West Fifth St., Suite 1600
Los Angeles, CA 90071
(213) 443-4355
jakro@kslaw.com
acraig@kslaw.com

Bruce W. Baber
KING & SPALDING LLP
1180 Peachtree St., NE, Suite 1600
Atlanta, GA 30309
(404) 572-4600
bbaber@kslaw.com

Attorneys for Plaintiffs
NOVO NORDISK A/S and
NOVO NORDISK INC.

BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ, PC

s/ Scott M. Douglass

Scott M. Douglass
(BPR #031097)

165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901)-526-2000
sdouglass@bakerdonelson.com

Attorneys for Defendant
Pro Health Investments, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via the Court's ECF filing system upon the following:

Scott M. Douglass
Baker, Donelson, Bearman Caldwell
& Berkowitz, PC
165 Madison Avenue, Suite 2000
Memphis, TN 38103
sdouglass@bakerdonelson.com

this the 27th day of July 2023.

s/ Steven A. Riley _____